
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No.: 18-19608
)	
Kerri-Ann S Anderson)	Chapter 13
)	
Debtor(s).)	Judge: Donald R. Cassling

NOTICE OF MOTION

TO: Kerri-Ann S Anderson, 1615 Fowler Ave Evanston, IL 60201 *via US mail*
Trustee Tom Vaughn, 55 E. Monroe Street, Suite 3850, Chicago, IL 60603 *via ECF clerk's electronic delivery system*

Capital One Auto Finance, a division of Capital One, N.A. c/o AIS Portfolio Services, LP, 4515 N Santa Fe Ave. Dept. APS, Oklahoma City, OK 73118 *via US mail*

U.S. Trustee, 219 S. Dearborn Suite 873, Chicago IL 60604 *via ECF clerk's electronic delivery system*

See attached service list

PLEASE TAKE NOTICE that on **August 29, 2019 at 10:00 a.m.**, I shall appear before the Honorable Judge Donald R. Cassling at the Federal Courthouse, 219 S. Dearborn, Room 619, Chicago, IL 60604 or any judge presiding and then and there present the **Motion**, a copy of which is attached hereto.

By: /s/ David H. Cutler
David H. Cutler

CERTIFICATE OF SERVICE

I, David H. Cutler, hereby certify that I caused to be served, electronically or through U.S. Mail, a copy of the foregoing Notice and Motion upon the parties named above on August 8, 2019 before the hour of 7:00 p.m. from the office located at 4131 Main Street., Skokie, Illinois 60076.

By: /s/ David H. Cutler
David H. Cutler, esq.
Counsel for Debtor(s):
Cutler & Associates, Ltd.
4131 Main St, Skokie, IL 60076
Phone: (847) 673-8600

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MOTION TO MODIFY PLAN POST CONFIRMATION

NOW COMES the Debtor, Kerri-Ann S Anderson (hereafter referred to as "the Debtor"), by and through her attorneys, The Law Offices of Cutler & Associates, Ltd., to present this Motion and state as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 USC 1334 and this is a "core proceeding" under 28 USC 157(b)(2).
2. The Debtor filed for relief under Chapter 13 of the United States Bankruptcy Code on July 12, 2018 and her Plan was confirmed on September 13, 2018.
3. The Debtor's confirmation Order provides for a plan payment of \$825 for 36 months with unsecured creditors receiving 10% of their unsecured claims.
4. The Debtor has fallen behind on her plan payments and a default has accrued, as of the date of this motion the current default is \$3,824.25.
5. The Debtor has paid in to date \$6,075.75 into the Chapter 13 plan.
6. The Debtor fell behind on the plan payments because she was having medical issues and incurred some out of pocket expenses and medical bills.
7. The Debtor is able to make her plan payments going forward but she is unable to catch up on the full default amount.

8. The Debtor seeks to modify the plan to defer the current trustee's default to the end of the plan.

WHEREFORE, the Debtor respectfully requests that this Court modify the Debtor's Plan Post Confirmation to defer the current default until the end of the plan; and for such further relief that this Court may deem just and proper.

Dated: August 8, 2019

Respectfully Submitted,

By: /s/ David H. Cutler
David H. Cutler, esq.,
Counsel for Debtor(s):
Cutler & Associates, Ltd.
4131 Main St.
Skokie, IL 60076
Phone: (847) 673-8600